

1 MARK D. PETERS (sbn110981)
Peters & Peters
2 645 Fourth Street, Suite 213
Santa Rosa, CA 95404
3 (707) 545-9250

4 Attorney for Defendant
HEALDSBURG UNIFIED SCHOOL DISTRICT
5

6 UNITED STATES DISTRICT COURT
7 NORTHERN DISTRICT OF CALIFORNIA
8

9 A.S., a minor; JUDITH SANDERSON,
individually and as parent of her minor
10 child,

11 Plaintiffs,

12 v.

13 HEALDSBURG UNIFIED SCHOOL
DISTRICT,

14 Defendant.
15 _____/

No. C 08-01776 CW

JOINT STATUS REPORT AND CASE
MANAGEMENT STATEMENT

DATE: August 12, 2008
TIME: 2:00 p.m.
CTRM: Two, Oakland

16 In advance of the Initial Case Management Conference, the parties, through
17 their respective Counsel, submit their Joint Status Report and Case Management Statement.
18

19 A. Summary of the claims and defenses:

20 The Complaint alleges causes of action for violation of the California
21 constitution and Sections 220 and 260 of the Education Code, and title 42 U.S.C. Section
22 2000d, premised upon racial harassment that Plaintiff A.S. experienced at Healdsburg Junior
23 High School, operated by Defendant Healdsburg Unified School District. Plaintiffs allege that
24 the response by the School District was inadequate.
25
26
27

1 B. Status of service on all defendants and cross-defendants:

2 The sole Defendant is the Healdsburg Unified School District, which has been
3 served and has answered.

4
5 C. Joinder of additional parties:

6 It is not anticipated that additional parties will be joined.

7
8 D. Amendments to the pleadings:

9 No amendments to the pleadings are presently contemplated.

10
11 E. Jurisdiction and venue:

12 Jurisdiction and venue are proper in this Court.

13
14 F. Discovery plan:

15 1. Changes in timing for initial disclosures:

16 The parties stipulated to continue the time for making Initial Disclosures to
17 August 5, 2008.

18
19 2. Subjects on which discovery may be needed:

20 Actual incidents occurred; complaints by minor and her mother; investigation,
21 findings and actions taken in response by School District, and damages.

22
23 3. Changes in the limitation on discovery imposed under federal or local
24 rules:

25 No changes are anticipated.

1 4. Timing of expert witness disclosures:

2 Disclosure of expert witness information to be made 75 days prior to Trial.

3
4 5. Proposed Discovery Cut-Off:

5 Discovery to cease 60 days prior to Trial.

6
7 6. Discovery Motion Cutoff:

8 Discovery motions to be heard no later than 45 days prior to Trial.

9
10 G. Cut-off for non-discovery motions:

11 Non-discovery motions to be heard no later than 30 days prior to Trial.

12
13 H. Pre-trial Conference and Trial:

14 Plaintiff's Counsel proposes that the case will be ready for Trial, and
15 requests that the Court set the Trial in April 2009. Defendant's Counsel is concerned that
16 the matter may not be ready for Trial by then, and that the end of the school year and
17 summer are traditionally difficult times for school personnel to attend Trial, and may
18 request that the matter be set for Trial in the fall of 2009.

19
20 I. Estimated days of Trial:

21 The Trial is expected to last up to ten days.

22
23 J. Appropriateness of Special Procedures:

24 No special procedures are contemplated at this time.

PROOF OF SERVICE

I am a citizen of the United States and a resident of the County of SONOMA. I am over the age of 18 years and not a party to the within above-entitled action. My business address is 645 Fourth St., Suite 213, Santa Rosa, California 95404. On the below mentioned date, I served the JOINT STATUS REPORT AND CASE MANAGEMENT STATEMENT on the attorneys of record in said action by entering it into the ECF System accessible to opposing Counsel:

Mr. Stephen J. Duggan
250 Healdsburg Avenue, Suite 201
Healdsburg, CA 95448

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: July 31, 2008

/s/ Mark D. Peters
Mark D. Peters